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File No. 104087B

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

Ivan H. Rogers
d/b/a I V N ME, LLC
Maria Rogers

DEBTORS

: CHAPTER 13
: CASE NO. 19-31534-CMG
: HEARING DATE: January 15, 2020
: OBJECTION TO
CONFIRMATION

Mortgagee, MTGLQ Investors, LP, by and through counsel, Pluese, Becker & Saltzman, LLC hereby tenders Objection to Confirmation of the proposed Plan herein upon one or more of the following grounds as applicable:

1. Failure to provide for full satisfaction of all amounts claimed in Mortgagee's soon to be filed Proof of Claim. The Plan proposes to pay arrearages in the amount of \$174,000. The estimated amount of the arrearages, in the Mortgagee's soon to be filed Proof of claim, is \$194,641.90.
2. Failure to propose a feasible Plan; and/or
3. Failure to otherwise conform to applicable provisions of the United States Bankruptcy Code or Rules.

In the event that the foregoing deficiencies are cured, waived or rendered moot prior to the date of the Confirmation hearing herein and no further grounds for Objection appear, then counsel for the Mortgagee will not appear at the Confirmation hearing and the foregoing Objections may be deemed withdrawn, except any Objection predicated upon feasibility, the difference between Debtor's estimate of pre-Petition arrears and the Mortgagee's Proof of Claim, the failure to provide for maintenance of tax and/or insurance premium payments and/or any provisions of the proposed Plan purporting to avoid or impair the Mortgagee's lien in which case the Mortgagee expressly reserves its rights and respectfully request that this Honorable Court establish a briefing schedule, valuation hearing or other procedure to resolve the Mortgagee's objection(s) to the proposed Plan.

Respectfully submitted,

Pluese, Becker & Saltzman, LLC

By: /s/ Rob Saltzman
Rob Saltzman, Esquire
Attorneys for Mortgagee,
MTGLQ Investors, LP